

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No: 20-CR-10012-IT
	)	
PAUL BATEMAN,	)	
Defendant.	)	

**ASSENTED-TO MOTION FOR EXCLUSION OF TIME**  
**UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through the undersigned Assistant United States Attorney, respectfully moves this Court to exclude the time period from April 12, 2021 through and including May 24, 2021 from the speedy trial clock, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), on the ground that the ends of justice served by excluding this period outweigh the best interests of the public and the Defendant in a speedy trial.

In support of this request, the government states that a status conference was held on April 12, 2021. During this conference, the parties reported on the status of the ongoing exchange of discovery letters proposed a schedule for resolving pending discovery requests, and, with the agreement of the parties, the Court scheduled a May 24, 2021 deadline for filing a motion to compel discovery. Both parties agreed to exclude the time from the Speedy Trial Act through that date. The parties jointly agree that this period constitutes “the reasonable time necessary for effective preparation, taking into account the exercise of due diligence,” and that the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). Counsel for the defendant assents to this motion, which the government files to memorialize the in-court agreement.

Respectfully submitted,

NATHANIEL R. MENDELL  
Acting United States Attorney

By: /s/ Anne Paruti  
Anne Paruti  
Assistant United States Attorney

Date: April 12, 2021

**CERTIFICATE OF SERVICE**

I, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti  
Assistant United States Attorney

Dated: April 12, 2021